

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 20050 & 22782

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On June 29, 2023, Celsius Network Limited (the “Claimant”) filed the proof of claim identified on Exhibit A (the “Proof of Claim”) attached to the Stipulation (defined below) asserting a secured claim against Alameda Research Ltd. arising out of certain loans made by Claimant to Alameda prior to the Petition Date.²

2. On July 24, 2024, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Debtors’ Sixty-Third (Substantive) Omnibus Objection to Certain Misclassified Claims (Non-Customer Claims)* [D.I. 20050] (the “Claim Objection”).

3. On August 12, 2024, the Blockchain Recovery Investment Consortium (the “BRIC Litigation Administrator”) in its capacity as the Litigation Administrator (ARM) for the post-

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Claimant has filed other proofs of claim against the Debtors relating to certain unrelated causes of action, which are not the subject of the Stipulation and which are the subject of a pending objection by the Debtors that is *sub judice* with the Court. See Debtors’ Objection to Proofs of Claim Filed by Celsius Network LLC and its Affiliated Debtors [D.I. 19795]; Debtors’ (I) Reply to the Celsius Litigation Administrator’s Response to Debtors’ Objection to Proofs of Claim Filed by Celsius Network LLC and Its Affiliated Debtors; and (II) Initial Objection to Late-Filed Proofs of Claim Filed by Celsius Network LLC and Its Affiliated Debtors [D.I. 24408].

confirmation estate of the Claimant filed the *Response of Celsius Network Limited to Debtors' Sixty-Third Omnibus Claims Objection* [D.I. 22782] (the "Response").

4. The Claimant (through the BRIC Litigation Administrator) and the Debtors have reached an agreement to resolve all litigation related to the Proof of Claim, Claims Objection, and Response, which is memorialized in the *Stipulation with Respect to Claim No. 3752* (the "Stipulation"). Attached hereto as Exhibit A is a proposed order (the "Proposed Order") approving the Stipulation. Attached as Exhibit 1 to the Proposed Order is the Stipulation, as agreed to by and between the Claimant and the Debtors.

5. The Claimant has no objection to the entry of the Proposed Order. In accordance with the Court's electronic order processing procedures, a copy of the Proposed Order shall be uploaded to CM/ECF.

6. Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: October 30, 2024
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
mcguire@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Benjamin S. Beller (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
gluecksteinb@sullcrom.com
bellerb@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession